

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-CR-20197-WILLIAMS/GOODMAN  
18 U.S.C. § 1546(a)

FILED BY WMS D.C.

MAY 1 2025

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - FT. PIERCE

UNITED STATES OF AMERICA

v.

**OLEKSANDR GORBUNENKO,**

**Defendant.**

/

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**  
**Making a False Statement in an Immigration Document**  
**(18 U.S.C. § 1546(a))**

On or about October 14, 2023, in Miami-Dade County, in the Southern District of Florida,  
the defendant,

**OLEKSANDR GORBUNENKO,**

under penalty of perjury, did knowingly make a false statement with respect to a material fact in an application or other document required by the immigration laws of the United States, that is, a Form I-821, Application for Temporary Protected Status, in that the defendant represented that he had never been cited, charged, or indicted, for breaking or violating any law or ordinance, whether in the United States or any other country, when in truth and in fact, and as the defendant then and there well knew, he had pending charges in Ukraine, alleging that he violated several provisions of the Criminal Code of Ukraine, in violation of Title 18, United States Code, Section 1546(a).

**COUNT 2**  
**Making a False Statement in an Immigration Document**  
**(18 U.S.C. § 1546(a))**

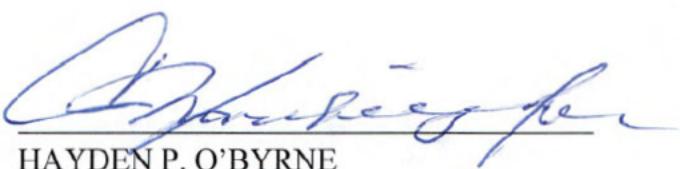
On or about October 14, 2023, in Miami-Dade County, in the Southern District of Florida, the defendant,

**OLEKSANDR GORBUNENKO,**

under penalty of perjury, did knowingly make a false statement with respect to a material fact in an application or other document required by the immigration laws of the United States, that is, a Form I-765, Application for Employment Authorization, in that the defendant represented that he had never been cited, charged, or indicted, for breaking or violating any law or ordinance, whether in the United States or any other country, when in truth and in fact, and as the defendant then and there well knew, he had pending charges in Ukraine, alleging that he violated several provisions of the Criminal Code of Ukraine, in violation of Title 18, United States Code, Section 1546(a).

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

  
HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

  
MICHAEL D. PORTER  
ASSISTANT UNITED STATES ATTORNEY



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: OLEKSANDR GORBUNENKO

Case No: 25-CR-20197-WILLIAMS/GOODMAN

Count #: 1

Making a False Statement in an Immigration Document, 18 U.S.C. § 1546(a)

- \* **Max. Term of Imprisonment:** 15 years
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years
- \* **Max. Fine:** \$250,000/\$100 Special Assessment

Count #: 2

Making a False Statement in an Immigration Document, 18 U.S.C. § 1546(a)

- \* **Max. Term of Imprisonment:** 15 years
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years
- \* **Max. Fine:** \$250,000/\$100 Special Assessment

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.